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August 28, 2001

Via Facsimile Transmission (617) 388-4419

Mr. John Graff
DISABILITY MANAGEMENT SERVICES, INC.
155 Federal Street, 7th Floor
Boston, Mass. 02110

Re: Eric Jeffries

Dear Mr. Graff:

This confirms our phone conversation from this afternoon which followed your review of my letter from earlier today.

As I indicated, Mr. Jeffries recently and voluntarily underwent a neuropsychological examination by a qualified and experienced psychologist who had no prior knowledge of Mr. Jeffries. I provided the detailed results of that examination to DMS over three weeks ago along with a plethora of additional information supporting Mr. Jeffries' disability claim.

In my view, absent some noted shortcoming with the neuropsychological examination already performed, there can be no valid purpose for demanding that Mr. Jeffries undergo another identical evaluation. And based on my conversations with Mr. Champagne last Monday and with you today, I understand that no one at DMS has spent any time or effort assessing or analyzing the neuropsychological examination already performed on Mr. Jeffries. That being the case, it is clear that DMS is not seeking another neuropsychological examination because of any known shortcomings with the earlier examination.

Accordingly, and appropriately I requested both in my letter earlier today and in my subsequent phone conversation with you that DMS share with me the reason it is demanding a second examination. The reason you provided (i.e., "the policy says we can") certainly cannot be the true reason as it has no logical merit. In fact, the only logical reason for demanding a redundant examination when the first examination has not even been reviewed is to harass Mr. Jeffries. This tactic leaves me wondering whether you have reviewed any information supplied in support of Mr. Jeffries' claim.

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08-28-01 05:26pm From-GRAYDON HEAD & RITCHIEY LLP

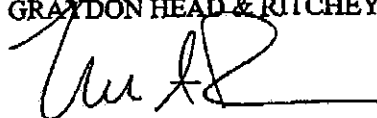
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Regardless of my suspicions regarding your untoward motives, Mr. Jeffries has and will continue to cooperate with his reasonable obligations under the Policy. At present, however, I remain unsatisfied that there exists a valid purpose in having a second neuropsychological exam performed when the first hasn't even been reviewed and a second would be compromised by the "practice effect." I will await to hear further from you but as I understand the matter, the scheduled examination for this Friday will be postponed. I look forward to hearing from you.

Very truly yours,

GRAYDON HEAD & RITCHEY LLP



Michael A. Roberts

MAR/ndc
Copy: Mr. Eric Jeffries

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